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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 79-5 and 7-11 and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to Consider Whether Another Party’s Material Should be Sealed for the following Documents:

	Document	Portions Sought to be Sealed
1	Special Master Garrie’s Amended Order Regarding Production of ADI Related Documents	Limited portions of the order that Facebook has designated Confidential under the Protective Order in this action, and which this Court has previously ordered sealed. Dkt. No. 764.
2	Exhibits A-N to Special Master Garrie’s Amended Order Regarding Production of ADI Related Documents	The exhibits to the order that Facebook has designated Confidential under the Protective Order in this action.

The above-listed documents contain, reference, or summarize materials designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action. Pursuant to Local Rule 79- 5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that all of the designated material is sealable.

Pursuant to Civil Local Rule 79-5(f), the following attachments accompany this motion:

- (1) A redacted version of Special Master Garrie’s Amended Order Regarding Production of ADI Related Documents;
- (2) An unredacted version of Special Master Garrie’s Amended Order Regarding Production of ADI Related Documents.
- (3) Exhibits A-N to Special Master Garrie’s Amended Order Regarding Production of ADI Related Documents. A redacted version of Exhibits A-N is not provided as Plaintiffs seek to file the entirety of this document under seal pending Defendant’s submission designating the material that it contends is sealable.

In light of the foregoing, Plaintiffs respectfully submit this pleading in connection with

the filings referenced above.

Dated: December 22, 2021

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
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Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of December, 2021, at Seattle, Washington.

/s/ Derek W. Loeser

Derek W. Loeser